

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	) <b>Bankruptcy No. 15-23523 CMB</b>
<b>Marita D. Zumpano,</b>	)
	) <b>Chapter 13</b>
<b>Debtor,</b>	)
	) <b>Document No.</b>
<b>Deutsche Bank National Trust Company,</b>	)
	) <b>Related to Doc. Nos. 41, 43</b>
<b>Movant,</b>	)
<b>vs.</b>	)
	)
<b>Marita D. Zumpano and</b>	)
<b>Ronda J. Winnecour, Trustee</b>	)
<b>No Respondents.</b>	)

**DECLARATION THAT THE PLAN IS SUFFICIENT  
TO COVER THE MORTGAGE PAYMENT CHANGE**

And now, comes the Debtor, by and through her attorney, Francis E. Corbett respectfully represents as follows:

1. The plan has scheduled payments in the amount of \$962.00, the plan is not yet finally confirmed.
2. The Notices of Mortgage Payment Change filed at Docket Nos. 41 and 43 recite a payment of \$696.23.
3. The Plan should incorporate the payment of \$696.23 as of July 1, 2016.

**Date: 06/27/16**

s/ Francis E. Corbett  
**Francis E. Corbett, Esquire PA I.D. #37594**  
[fcorbett@fcorbettlaw.com](mailto:fcorbett@fcorbettlaw.com)  
**310 Grant Street, Suite 1420**  
**Pittsburgh, PA 15219-2230**  
**(412) 456-1882**